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Attorneys for Defendant GOOGLE LLC

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ROBERT HEATH, on behalf of himself,  
 and  
 CHERYL FILLEKES, on behalf of himself,  
 and others similarly situated,  
  
 Plaintiffs,  
  
 v.  
  
 GOOGLE LLC, a Delaware limited liability  
 company,  
  
 Defendant.

Case No. 5:15-cv-01824-BLF

**DECLARATION OF BRIAN ONG IN  
 SUPPORT OF PLAINTIFF'S  
 ADMINISTRATIVE MOTION TO SEAL  
 PORTIONS OF PLAINTIFF'S RESPONSE  
 IN OPPOSITION TO GOOGLE LLC'S  
 MOTION FOR LEAVE FOR  
 RECONSIDERATION OF ORDER  
 DENYING MOTION FOR  
 DECERTIFICATION**

Complaint Filed: April 22, 2015  
 Trial Date: April 1, 2019

- 1 5. I believe Google will suffer competitive harm if this confidential information is made  
2 public. Based on my work experience at Google, I know there is competition in Silicon  
3 Valley, and throughout the world, for top software engineering talent and other technical  
4 talent. I also know that Google has devoted, and continues to devote, an extraordinary  
5 amount of time, money, and human resources toward developing internal processes and  
6 programs for identifying, interviewing, and evaluating employment candidates for  
7 software engineering positions and other types of technical positions at Google.
- 8 6. The reports, especially when considered collectively, contain competitively sensitive  
9 information related to the manner and means by which Google recruits and evaluates  
10 candidates. Based on my work experience at Google, I believe that Google may suffer  
11 competitive injury if other employers of top software engineering talent or other top  
12 technical talent were to gain access to the materials, especially if other employers were  
13 to gain access to these materials collectively. Other employers could use these materials  
14 to discern Google's strategies, techniques and business processes for evaluating  
15 candidates, and thereby gain a competitive advantage when courting candidates for the  
16 same or similar positions and in hiring generally. Similarly, applicants for engineering  
17 and technical positions could use these materials, which contain confidential information  
18 about the kinds of technical questions and interviews that Google interviewers conduct,  
19 to give them an artificial advantage in interviews. This would diminish the value of these  
20 interview techniques to Google, and, as I mentioned above, Google has devoted and  
21 continues to devote substantial time, money and resources to developing its interview  
22 techniques and processes.
- 23 7. Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
24 correct. I executed this declaration on September 14, 2018 in Mountain View, California.

25   
26 Brian Ong

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